

# **EXHIBIT C**

IN THE UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION

LOGAN PAUL, §  
§  
*Plaintiff,* §  
§  
vs. § Civil Action No. 5:24-cv-717-OLG-  
§ HJB  
STEPHEN FINDEISEN AND COFFEE §  
BREAK PRODUCTIONS LLC D/B/A §  
COFFEEZILLA, §  
§  
*Defendant.* \_\_\_\_\_

**DON HOLLAND'S OBJECTIONS AND RESPONSES TO SUBPOENA**  
**REQUESTS FOR DOCUMENTS**

TO: Plaintiff Logan Paul, by and through his attorneys of record, Andrew C. Phillips, Shannon B. Timmons, Meier Watkins Phillips Pusch LLP, 919 18<sup>th</sup> Street NW, Suite 640, Washington, DC 20006.

Non-Party Don Holland hereby serves the following objections and responses to Plaintiff Logan Paul's Subpoena to Produce Documents.

Respectfully Submitted,

*/s/ Leigh S. Montgomery*  
Jarrett Ellzey  
Texas Bar No. 24040864  
Leigh S. Montgomery  
Texas Bar No. 24052214  
**ELLZEY KHERKHER SANFORD**  
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**ATTORNEYS FOR NON-PARTY TOM  
KHERKHER**

**CERTIFICATE OF SERVICE**

I certify that on June 2, 2025, a copy of the foregoing document was served on all parties in accordance with the protocols for e-filing in the Federal Rules of Civil Procedure.

*/s/ Leigh S. Montgomery*  
Leigh S. Montgomery

**DON HOLLAND'S OBJECTIONS AND RESPONSES TO SUBPOENA  
REQUESTS FOR DOCUMENTS**

**DOCUMENT REQUEST NO. 1:**

All nonprivileged documents and communications concerning CryptoZoo, Logan Paul and/or Logan Paul's involvement with CryptoZoo and/or the promotion of CryptoZoo-related cryptocurrency, tokens, or non-fungible tokes ("NFTs").

**ANSWER:** Non-Party Don Holland objects to the request in that it is disproportionately burdensome to the non-party, considering the parties' relative access to relevant information, the parties' resources and the burden/expense outweighing the likely benefit of requiring a non-party to produce publicly available information and/or information already in the possession, custody and/or control of the Parties to this litigation. Non-Party Don Holland further asserts the information or documents request may be the subject of attorney work product privileges, or other investigative privileges in this litigation.

**DOCUMENT REQUEST NO. 2:**

All nonprivileged communications between You and Stephen Findeisen a/k/a Coffeezilla, or any other person purporting to act on behalf of Mr. Findeisen or the Coffeezilla YouTube series, concerning CryptoZoo and/or Logan Paul.

**ANSWER:** Non-Party Don Holland objects to the request in that it is disproportionately burdensome to the non-party, considering the parties' relative access to relevant information, the parties' resources and the burden/expense outweighing the likely benefit of requiring a non-party to produce publicly available information and/or information already in the possession, custody and/or control of the Parties to this litigation.

Subject thereto, there are no non-privileged responsive documents to this request from non-Party Don Holland.

**DOCUMENT REQUEST NO. 3:**

All nonprivileged documents and communications relating to purchases or sales of CryptoZoo-related cryptocurrency, tokens, or NFTs, including all potential purchases or sales considered by You.

**ANSWER:** Non-Party Don Holland objects to the request in that it is disproportionately burdensome to the non-party, considering the parties' relative access to relevant information, the parties' resources and the burden/expense outweighing the likely benefit of requiring a non-party to produce publicly available information and/or information already in the possession, custody and/or control of the Parties to this litigation.

**DOCUMENT REQUEST NO. 4:**

All nonprivileged documents and communications relating to Logan Paul's offer to buy back CryptoZoo base eggs and base animals.

**ANSWER:** Non-Party Don Holland objects to the request in that it is disproportionately burdensome to the non-party, considering the parties' relative access to relevant information, the parties' resources and the burden/expense outweighing the likely benefit of requiring a non-party to produce publicly available information and/or information already in the possession, custody and/or control of the Parties to this litigation.

Subject thereto, as to Non-Party Don Holland, this request is inapplicable as Mr. Holland did not participate in any alleged "offer to buy back CryptoZoo base eggs and base animals." Any information about this alleged offer is public record and/or more accessible to the parties to this litigation than a non-party.

**DOCUMENT REQUEST NO. 5:**

All nonprivileged documents and communications relating to Your purchases of cryptocurrency and/or cryptocurrency-related products other than CryptoZoo-related cryptocurrency, tokens, or NFTs.

**ANSWER:** Non-Party Don Holland objects to the request in that it is disproportionately burdensome to the non-party, considering the parties' relative access to relevant information, the parties' resources and the burden/expense outweighing the likely benefit of requiring a non-party to produce publicly available information and/or information already in the possession, custody and/or control of the Parties to this litigation. The information sought is irrelevant to the instant matter and invades the privacy rights of a non-party to this litigation.